

Keith W. Heard (KH-8578)
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**TAGANROGA SHIPPING
CORPORATION,**

Plaintiff,

-against-

**SEASPEED CARGO AND SEA
TRANSPORT LLC (a/k/a SEASPEED
DUBAI),**

Defendant.

**AFFIDAVIT IN SUPPORT
OF MARITIME
ATTACHMENT UNDER
SUPPLEMENTAL RULE B**

ON CV 7216(CM)

STATE OF NEW YORK)

COUNTY OF NEW YORK)

KEITH W. HEARD, being duly sworn, deposes and states the following under oath:

1. I am a member of the bar of this Court and a partner in the law firm of Burke & Parsons. I am familiar with the facts of this matter and make this Affidavit in support of Plaintiff's request for the issuance of a Writ of Maritime Attachment and Garnishment, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims, annexed to the Federal Rules of Civil Procedure.

2. I have attempted to locate Defendant Seaspeed Cargo and Sea Transport LLC (a/k/a Seaspeed Dubai) within this District. As part of my investigation to locate Defendant within this District, I checked on-line telephone information directories and did not find any listings for the Defendant in New York. I also checked the 2007

Transportation Telephone Tickler published by *The Journal of Commerce* and found no entry for the Defendant in the New York metropolitan area. Internet searches at www.yahoo.com and www.google.com failed to reveal any information suggesting a presence of the Defendant within the Southern District of New York. In addition, the information available through an Internet search of the New York State Department of Corporations Database, did not contain any listing for the Defendant.

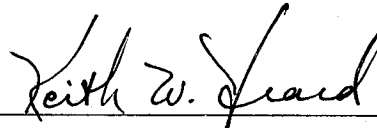
3. I also checked what I believe to be Defendant's website at the following URL address: www.seaspeeduae.com. This website does not disclose any address for or physical presence of the Defendant within the District.

4. The foregoing investigation has also failed to reveal any address, representative or agent within the District that the Defendant may have designated for the receipt of process to be served upon Defendant.

5. Based upon the foregoing, it is apparent that Defendant cannot be found within this District within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims.

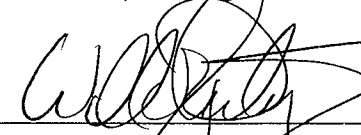
6. Upon information and belief, Defendant has, or may have during the pendency of this action, property, goods, chattels, funds or credits and effects within the District in the hands of garnishees, including, but not limited to, ABN Amro; American Express Bank; Bank of America NA; Bank of New York; Citibank; Deutsche Bank AG; HSBC Bank USA NA; JP Morgan Chase Bank; Standard Chartered Bank; and/or Wachovia Bank or others.

7. This is Plaintiff's first request for this relief.



Keith W. Heard

Sworn to before me this
13th day of August 2007.



Notary Public

WILLIAM F. DOUSHERTY
Notary Public, State of New York
No. 02006121747, Qual. in Rockland County
Certificate Filed in New York County
Commission Expires January 24, 2009

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